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March 20, 2019

VIA FEDERAL EXPRESS

Ms. Melanie Sandoval Bureau Chief of Records Management Public Regulation Commission 1120 Paseo de Peralta, Room 418 Santa Fe, New Mexico 87504-1269

Case No. 18-00383-UT; In the Matter of the Filing of Advice Notice No. 69 by Socorro Electric Cooperative, Inc.

Dear Ms. Sandoval:

We enclose for filing the original and six copies each of SEC's Response in Opposition to City of Socorro's Motion Requesting the Public Regulation Commission Schedule Public Comment in Socorro, New Mexico and Certificate of Service. Kindly forward an endorsed copy of each in the enclosed self-addressed, stamped envelope. Please feel free to contact us should you have any questions. Thank you for your attention to this matter.

Very truly yours,

WIGGINS, WILLIAMS & WIGGINS A Professional Corporation

By

Christie Griego

Paralegal

CAG:me

Enclosures

cc:

Service List

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE FILING)	
OF ADVICE NOTICE NO. 69)	
BY SOCORRO ELECTRIC)	
COOPERATIVE, INC.)	
)	Case No. 18-00383-UT
SOCORRO ELECTRIC)	
COOPERATIVE, INC.,)	
)	
Applicant.)	
• •)	

SEC'S RESPONSE IN OPPOSITION TO CITY OF SOCORRO'S MOTION REQUESTING THE PUBLIC REGULATION COMMISSION SCHEDULE PUBLIC COMMENT IN SOCORRO, NEW MEXICO

The Socorro Electric Cooperative, Inc. ("SEC") opposes City of Socorro's Motion Requesting the Public Regulation Commission Schedule Public Comment in Socorro, New Mexico (the "Motion") and as grounds therefore, states the following:

- 1. SEC objects to holding a single public comment session in Socorro at the offices of one of the primary protestors, the City of Socorro, because of the multiple opportunities SEC has already afforded its customers to comment about its proposed rate adjustments, because the proposed location is not convenient for a vast number of SEC members, and because there is already an established process for submitting public comments set out in the February 15, 2019 Procedural Order.
- 2. SEC provides electric service in Catron, Cibola, Sierra, Socorro, and Valencia counties in New Mexico. SEC filed its rate adjustment, Advice Notice No. 69, with the Public Regulation Commission on December 3, 2018. Prior to filing Advice Notice No. 69, SEC held multiple meetings throughout this expansive service territory with customers in various rate classes to explain to members the purpose and need for the proposed rate changes and to hear input from its members regarding those rate changes.

- 3. SEC scheduled and conducted meetings designed exclusively for SEC members who are residential customers. Those meetings were held throughout the SEC service areas at various times during the day to accommodate the differing work and life schedules of SEC members. These community meetings were an opportunity for SEC residential rate members to ask questions and engage in discussions and dialogue with SEC staff and Trustees in attendance at the meetings.
- 4. The SEC community meetings with residential customers occurred over a two week period and were held in the following locations:
- a. On October 16, 2018, SEC held a meeting at the Veguita Senior Citizens Center at 6:30 p.m. Nine SEC members attended that meeting.
- b. On October 17, 2018, SEC held a community meeting at the SEC Engineering Room at its Socorro location at 2:00 p.m. Eleven SEC members attended.
- c. SEC held a meeting on October 18, 2018 at the Old School Gym in San Antonio at 6:30 p.m. Seven SEC members attended.
- d. On October 19, 2018, SEC held a meeting at the Socorro County Annex Building at 6:00 p.m. Sixteen members attended that meeting.
- e. SEC held a meeting on October 20, 2018 at the Rio Communities Fire Department for the Tierra Grande Homeowner's Association Annual Meeting at 12:30 p.m. Sixteen SEC members attended.
- f. SEC held a meeting on October 22, 2018 at the Magdalena Senior Citizens
 Center at 6:30 p.m. Eight members attended that meeting.
- g. SEC held a meeting on October 23, 2018 at the Alamo Navajo Chapter Wellness Center at 2:00 p.m. Fourteen SEC members attended.

- h. On October 25, 2018, SEC held a community meeting at the Datil Elementary Gymnasium at 3:00 p.m. Eleven SEC members attended.
- 5. At each residential customer meeting, SEC informed members it was willing to continue to meet with any member who had a concern about the proposal and to attempt to resolve those concerns.
- 6. SEC also met with multiple "large kWh usage" members and representatives, including retail and commercial businesses, the Alamo Navajo Chapter, and various charter and school districts. The primary purpose of the meetings with the large kWh consumers was to review the proposed rate structures as applied to each of these members. SEC provided these members with billing comparisons showing the estimated annual change in revenue to SEC for each applicable rate for each member, should the proposed rates be approved and their energy consumption for 12-month period from September 2017 to August 2018 be repeated. The meetings with large kWh usage members included the following:
- a. On September 17, 2018, SEC met with representatives of Dicaperl Minerals, the operator of a perlite mine near Socorro. In attendance were Dicaperl employees Alan Norris, Plant Manager; Nadine Blythe, Office Manager; Kim Woods, Logistics Manager and Dicaperl's energy consultants.
- b. On September 18, 2018, SEC held a series of meetings with representatives of the Socorro Wal-Mart, Magdalena Municipal Schools, Cottonwood Valley Charter School and Socorro General Hospital.
- c. On September 19, 2018, SEC met with New Mexico Institute of Mining and Technology (NM Tech) representatives Dr. Stephen Wells, President and Dr. Cleve McDaniel, Vice-President for Administration and Finance.

- d. On September 20, 2018, SEC met with representatives from Socorro Consolidated Schools and later with representatives of the National Radio Astronomy Observatory (NRAO), which manages the Very Large Array west of Socorro.
- e. On September 21, 2018, SEC met with the Alamo Navajo School Board's Acting Executive Director and other staff members and the school board's consultant.
- f. SEC participated in a telephonic conference on September 24, 2018 with Magellan Pipeline's consultant Ken Sissingh, Program Director Sustainability Director NORESCO.
- g. On September 28, 2018, SEC met with the Belen Consolidated Schools La Promesa Elementary, which is located within SEC's service area.
- h. On October 2, 2018, SEC met with the City of Socorro at SEC's Board Room. In attendance were Ravi Bhasker, Mayor; Donald Monette, City Manager; Leopoldo Pineda Jr., Chief Procurement Officer; Nann Winter, legal counsel and Edwin Reyes, Energy Consultant for the City of Socorro.
- i. On October 4, 2018 SEC met with Don Goodman, Principal of the Quemado Schools, to discuss the Datil and Quemado schools. SEC later spoke with David Lackey, the Superintendent of Quemado Schools via a teleconference.
- j. On October 11, 2018, at the Stallion Range Site, SEC met with Craig P. Collins, CIV USARMY, to discuss the White Sands Missile Range meters and to review the rate comparisons.

As noted above, there is already an established process for submitting public comments set out in the February 15, 2019 Procedural Order. SEC proposes that members wishing to provide comment do so in person or via email in accordance with paragraph O of the February 15, 2019 Procedural Order in this matter which provides that "Interested persons may appear at

the time and place of hearing and make written or oral comments without becoming intervenors.

Written comments ... may also be sent to the Commission at the following address...."

For the foregoing reasons, SEC respectfully requests the Motion be denied.

WIGGINS, WILLIAMS & WIGGINS A Professional Corporation

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Attorneys for SEC

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BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE FILING OF)	
ADVICE NOTICE NO. 69 BY SOCORRO)	
ELECTRIC COOPERATIVE, INC.)	Case No. 18-00383-UT
)	
SOCORRO ELECTRIC COOPERATIVE,)	
INC., APPLICANT	_)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of The Socorro Electric Cooperative, Inc.'s (SEC) Response in Opposition to City of Socorro's Motion Requesting the Public Regulation Commission Schedule Public Comment in Socorro, New Mexico and this Certificate of Service were served on March 20, 2019, as indicated below, to the following:

Via Email to:

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Larry Blank, Ph.D.

Additional Intervenors:

Mark K. Adams
Don and Rita Steinnerd

Protestors:

Mayor Ravi Bhasker
Donald Monette
Leopoldo Pineda, Jr.
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